

**FINAL
ENVIRONMENTAL ASSESSMENT**

**JTF-6 BORDER FENCE
CONSTRUCTION AND MAINTENANCE
CALEXICO, IMPERIAL COUNTY, CALIFORNIA**

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March 1997

FINDING OF NO SIGNIFICANT IMPACT

JTF-6 BORDER FENCE CONSTRUCTION CALEXICO, IMPERIAL COUNTY, CALIFORNIA

The primary purpose of the proposed action is to assist in fulfilling the U.S. Border Patrol's and the Imperial County Sheriff's Department's missions to reduce illegal drug trafficking along the border by increasing their ability to patrol the Calexico area. The proposed action would include approximately 5.75 miles of fence replacement and the concurrent removal of 5.75 miles of existing fence by JTF-6, along the U.S.-Mexico border, near Calexico, Imperial County, California.

Construction of approximately 2.5 miles of landing mat fence on the west side of the Calexico port-of-entry and 3.25 miles of bollard fence on the east side of the Calexico port-of-entry is proposed to replace the existing chainlink fence. The new fence would be placed approximately 2 feet north of the international boundary. Proposed fence construction activities would occur within a 25 foot wide area north of the U.S.-Mexico border. An existing unimproved road parallel to the existing fence would be used during construction and no road improvements are planned under the proposed action.

Military personnel to be utilized during the proposed fence replacement would be from the 40th Engineer Brigade (132nd Engineer Battalion). Approximately 300 troops are expected to be utilized during construction. Troops will bivouac at the Naval Air Field in El Centro.

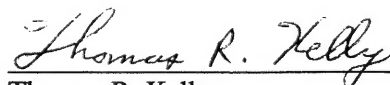
Alternatives considered included no action and the proposed action described above. The no action alternative would not facilitate the U.S. Border Patrol mission to reduce illegal drug activity along the border. Of the alternatives considered, the proposed action would be most compatible with the U.S. Border Patrol mission.

A Programmatic Environmental Impact Statement (PEIS) was prepared in 1994 for the Immigration and Naturalization Service (INS) and JTF-6 proposed projects that facilitate Law Enforcement Agencies (LEAs) missions to reduce illegal drug activity along the southwestern border of the U.S. The PEIS addresses the cumulative effects of past and reasonably foreseeable projects undertaken by JTF-6 for numerous LEAs in the four southwestern states (Texas, New Mexico, Arizona, and California). The Environmental Assessment (EA) for the proposed action tiers from the PEIS completed for JTF-6 and INS activities along the U.S.-Mexico border (U.S. Army 1994b). Cooperating agencies involved with the proposed action include U.S. Border Patrol, California National Guard, and JTF-6.

No significant adverse affects to the natural environment are expected by implementing the proposed action. In addition, no adverse impacts to Federally protected threatened/endangered species or habitats are expected. Based upon the results of the EA and the environmental design measures to be incorporated as part of the proposed action, it has been concluded that the proposed action will not have a significant adverse effect on the environment.

13 March 1997

Date



Thomas R. Kelly
Colonel, U.S. Marine Corps
Deputy Commander

EXECUTIVE SUMMARY

This Environmental Assessment (EA) assesses the potential for significant adverse or beneficial environmental impacts of the proposed action and alternatives in accordance with provisions of the National Environmental Policy Act (NEPA). The proposed action involves approximately 5.75 miles of fence replacement and the concurrent removal of 5.75 miles of existing fence by JTF-6, along the U.S.-Mexico border, near Calexico, Imperial County, California. This document was tiered from the Programmatic Environmental Impact Statement completed for Joint Task Force Six (JTF-6) activities along the U.S.-Mexico border (U.S. Army 1994b). A Programmatic Environmental Impact Statement (PEIS) was prepared in 1994 for the Immigration and Naturalization Service (INS) and JTF-6 proposed projects that facilitate law enforcement agencies (LEAs) missions to reduce illegal drug activity along the southwestern border of the U.S. The PEIS addresses the cumulative effects of past and reasonably foreseeable projects undertaken by JTF-6 for numerous LEAs in the four southwestern states (Texas, New Mexico, Arizona, and California).

Cooperating agencies involved with the proposed action include U.S. Border Patrol, California National Guard, and JTF-6. The U.S. Border Patrol, El Centro Sector has requested support from JTF-6 for the use of military personnel and equipment to complete the proposed action. JTF-6 contracted the Fort Worth District, U.S. Army Corps of Engineers to assess the potential for impacts related to proposed fence replacement. Replacement of area fences along the border is critical to successful interdiction of narcotics and apprehension of narcotics traffickers. The proposed action would increase the U.S. Border Patrol's ability to complete their mission of reducing illegal drug traffic into the U.S.

Construction of approximately 2.5 miles of landing mat fence on the west side of the Calexico port-of-entry and 3.25 miles of ballard fence on the east side of the Calexico port-of-entry is proposed to replace the existing chainlink fence. The new fence would be placed approximately two feet north of the international boundary. Proposed fence construction activities would occur within a 25 feet wide area north of the U.S.-Mexico border. An existing unimproved road parallel to the existing fence would be used during construction and no road improvements are planned under the proposed action.

Military personnel to be utilized during the proposed fence replacement would be the 40th Engineer Brigade (132nd Engineer Battalion). Approximately 300 troops are expected to be utilized during construction. Troops will bivouac at the Naval Air Field in El Centro.

Alternatives considered included no action and the proposed action described above. The no action alternative would not facilitate the U.S. Border Patrol mission to reduce illegal drug activities along the border. Of the alternatives considered, the proposed action would be most compatible with the U.S. Border Patrol mission.

Implementing the proposed action would result in the clearing of less than eight acres of poor quality vegetated habitat. The most common vegetation is non-native, so impacts to vegetation are expected to be minimal. Potential soil erosion and related surface water runoff impacts are possible during construction efforts of the proposed action. Procedures and methods that should be implemented to mitigate impacts to soils and surface water resources have been developed in the Storm Water Pollution Prevention Plan (PPP) for the proposed action. Recommendations outlined in the PPP would reduce surface water runoff from the proposed

project area to receiving drainages. A Notice of Intent as part of the PPP for the proposed action would be submitted to the State of California State Water Resources Control Board (SWRCB) by the owner of the site prior to the commencement of construction.

There would be no significant adverse affects to the natural environment associated with the proposed projects. The proposed action would not impact area soil, land use, water resources, air quality, biological resources, cultural resources, or socioeconomic resources. Impacts of the proposed action would not affect any listed or species proposed for listing as threatened or endangered in accordance with the Endangered Species Act.

TABLE OF CONTENTS

1.0	INTRODUCTION	1-1
1.1	Background.....	1-1
1.2	Location of the Proposed Action.....	1-1
1.3	Purpose and Need.....	1-3
1.4	Applicable Environmental Statutes and Regulations	1-3
2.0	DESCRIPTION OF PROPOSED AND NO ACTION ALTERNATIVES	2-1
2.1	Proposed Action.....	2-1
2.2	No Action	2-1
3.0	AFFECTED ENVIRONMENT.....	3-1
3.1	Land Use	3-1
3.2	Biological Resources	3-1
3.2.1	Vegetation	3-1
3.2.2	Wildlife	3-1
3.2.3	Threatened and Endangered Species	3-2
3.3	Cultural Resources.....	3-2
3.3.1	Cultural Overview	3-2
3.3.2	Previous Cultural Resources Investigations.....	3-5
3.3.3	Known Cultural Resources Properties	3-6
3.3.4	Newly Recorded Sites	3-6
3.4	Socioeconomics.....	3-6
3.4.1	Population	3-6
3.4.2	Employment and Income	3-7
3.5	Air Quality	3-7
3.6	Water Resources	3-7
4.0	ENVIRONMENTAL CONSEQUENCES	4-1
4.1	Proposed Action.....	4-1
4.1.1	Land Use	4-1
4.1.2	Biological Resources	4-1
4.1.2.1	Vegetation	4-1
4.1.2.2	Wildlife	4-1
4.1.2.3	Threatened and Endangered Species	4-1
4.1.3	Cultural Resources.....	4-2
4.1.4	Socioeconomics.....	4-2
4.1.4.1	Environmental Justice.....	4-3
4.1.5	Air Quality	4-4
4.1.6	Water Resources	4-4
4.2	No Action Alternative.....	4-4
4.3	Cumulative Impacts.....	4-4
5.0	ENVIRONMENTAL DESIGN MEASURES.....	5-1
6.0	PUBLIC INVOLVEMENT	6-1

7.0	REFERENCES	7-1
8.0	LIST OF ACRONYMS/ABBREVIATIONS	8-1
9.0	LIST OF PREPARERS	9-1

APPENDIX A Correspondence

APPENDIX B Stormwater Pollution Prevention Plan

LIST OF FIGURES

Figure 1-1.	General Location of Calexico Road and Fence Construction.....	1-2
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LIST OF TABLES

Table 1-1.	Applicable Environmental Statutes and Regulations	1-4
Table 3-1.	Habitat Requirements and Reasons for Decline of Federally Endangered, Threatened, and Proposed Endangered Species Potentially Occurring near Calexico, California	3-3

1.0 INTRODUCTION

1.1 Background

The U.S. is experiencing high levels of drug use and increasing amounts of drug-related crime. Negative impacts of widespread drug use on society continue to affect the work force, educational system, general law and order, and traditional family values and structure. Rising rates of violent crime, serious damage to the Nation's health and economy, and strains on vital relationships with international allies led the U.S. Congress to develop the National Drug Control Strategy (NDCS) and Department of Defense (DoD) involvement. The Secretary of Defense established Joint Task Force Six (JTF-6) in November 1989 to coordinate all DoD counterdrug support to Federal, state and local law enforcement agencies (LEAs) in their efforts to curtail drug smuggling activities into the United States border region and protect national security. JTF-6 assistance to LEAs includes operational and training efforts, design and construction, and logistical actions provided there is a nexus to drug interdiction and the assistance would provide all or part of the mission-essential training elements of the military unit involved.

This Environmental Assessment (EA) addresses potential impacts associated with proposed construction of approximately 5.75 miles of new fence and the concurrent removal of 5.75 miles of existing fence by JTF-6, along the U.S.-Mexico border, near Calexico, California. This document was tiered off of an existing Programmatic Environmental Impact Statement completed for JTF-6 and the Immigration and Naturalization Service (INS), activities along the U.S.-Mexico border (U.S. Army 1994). In addition, other Environmental Assessments in Imperial County and the surrounding area were used to obtain general information on natural resources in Southern California.

1.2 Location of the Proposed Action

The proposed action is located in Imperial County, California near the city of Calexico (Figure 1-1), which is approximately 100 miles east of San Diego. The proposed action consists of replacing approximately 5.75 miles of border fence north of the U.S.-Mexico border, and adjacent to Calexico.

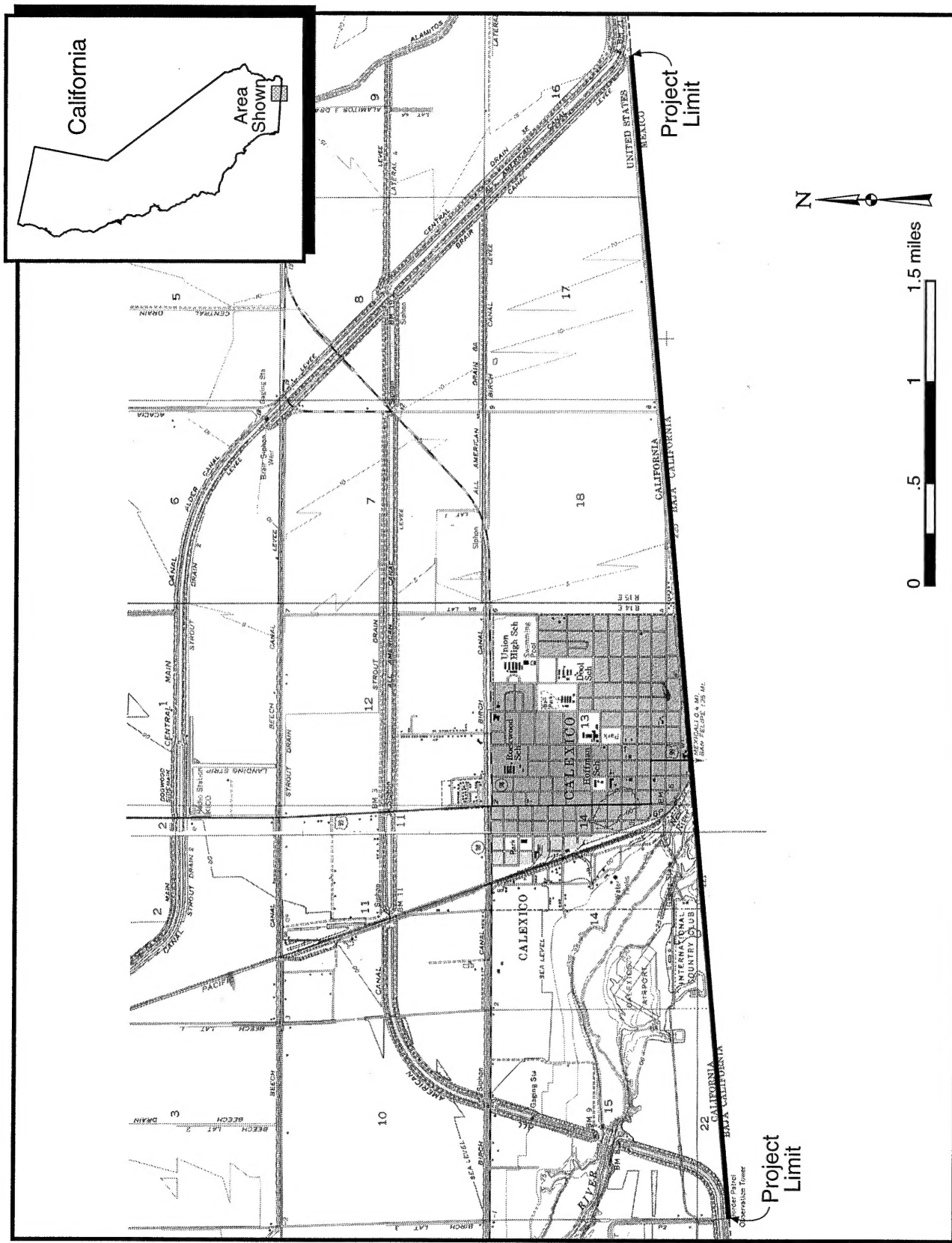


Figure 1-1. Location of proposed fence construction near Calexico, CA.

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1.3 Purpose and Need

Replacement of area fences along the border is critical to successful interdiction of narcotics and apprehension of narcotics traffickers. During fiscal year 1996, U.S. Border Patrol agents in the El Centro border patrol sector seized over 97,500 pounds of marijuana valued at over \$78 million, and over 5,700 pounds of cocaine valued at over \$182 million. Assaults on agents have increased significantly as attempts to move narcotics across the border have increased; the proposed project is needed to help ensure agent safety. The completion of this work would not only enhance the U.S. Border Patrol's ability to interdict drug traffickers, but would cut operating costs by reducing border fence maintenance costs.

Another objective of the proposed action, and required goal for DoD, would be the provision of training opportunities for the California 40th Engineer Brigade (132nd Engineer Battalion) personnel in deployment and redeployment, logistics and design planning, and construction. Support provided to the U.S. Border Patrol from the California National Guard and JTF-6 during this project would involve aid in improving the condition of border fence to enhance drug interdiction activities.

1.4 Applicable Environmental Statutes and Regulations

This EA was prepared by Geo-Marine, Inc. (GMI), for the U.S. Army Corps of Engineers (USCOE), Fort Worth District, in accordance with, but not limited to, the National Historical Preservation Act of 1966, as amended; the Archeological and Historical Preservation Act of 1974, as amended; the National Environmental Policy Act of 1969 (NEPA); Endangered Species Act of 1973; as amended; Fish and Wildlife Coordination Act; Army Regulation 200-2; Executive Order No. 11593, "Protection and Enhancement of the Cultural Environment"; E.O. No. 11988, "Flood Plain Management"; and E.O. No. 11990, "Protection of Wetlands." Table 1-1 summarizes the pertinent environmental requirements that guided the development of this EA.

Table 1-1

Applicable Environmental Statutes and Regulations

Environmental Regulation

Federal Statutes

Archeological and Historic Preservation Act
Clean Air Act, as amended
Clean Water Act, as amended
Endangered Species Act, as amended
Federal Water Project Recreation Act, as amended
Fish and Wildlife Coordination Act, as amended
Land and Water Conservation Fund Act, as amended
Marine Protection, Research and Sanctuaries Act
Migratory Bird Treaty Act
National Historic Preservation Act, as amended
National Environmental Policy Act, as amended
Watershed Protection and Flood Prevention Act
Wild and Scenic Rivers Act, as amended
Farmland Protection Policy Act
Native American Graves Protection and Repatriation Act

Executive Orders, Memorandums, etc.

Flood Plain Management (E.O. 11988)
Protection of Wetlands (E.O. 11990)
Environmental Effects Abroad of Major Federal Actions (E.O. 12114)
Federal Actions to Address Environmental Justice in Minority Populations
and Low-Income Populations (E.O. 12898)

Statutes Regulations, or Applicable Permits

California Environmental Quality Act
California Air Quality Standards

2.0 DESCRIPTION OF PROPOSED AND NO ACTION ALTERNATIVES

2.1 Proposed Action

The proposed action is replacement of 5.75 miles of border fence adjacent to Calexico, California. The existing fence would be removed concurrent with new fence construction. Construction of approximately 2.5 miles of landing mat fence on the west side of the Calexico port-of-entry and 3.25 miles of ballard fence on the east side of the Calexico port-of-entry is proposed to replace the existing chainlink fence. The new fence would be placed approximately two feet north of the international boundary. Proposed fence construction activities would occur within a 25 feet wide area north of the U.S.-Mexico border. An existing unimproved road parallel to the existing fence would be used during construction. No road improvements are planned under the proposed action. A ditch on the west side of Calexico will be filled with adjacent spoil to allow enough room for fence construction activities. The ditch contains very little vegetation, is not considered a jurisdictional wetland, and does not provide drainage for on-site or surrounding properties. The 40th Engineer Brigade (132nd Engineer Battalion) would complete the construction. Approximately 300 military personnel would be utilized during construction. Troops will bivouac at the Naval Air Field in El Centro. All construction equipment will be stored on or near the International Country Club golf course.

The landing mat and ballard fences are stronger than chainlink fence, and resistant to cutting. This would not only reduce smuggling, but overall maintenance costs will be lower. Chain link fence is easily cut and must continually be repaired. Therefore, new fence construction would reduce the money and time spent repairing border fences, and increase the effectiveness of the U.S. Border Patrol in reducing the amount of illegal drug trafficking near Calexico.

2.2 No Action

This action would involve the use of existing chain link fence without any improvements. Although no significant adverse impacts would occur if implemented, the no action alternative would not increase U.S. Border effectiveness in reducing drug smuggling and trafficking near Calexico.

3.0 AFFECTED ENVIRONMENT

3.1 Land Use

The only developed area is the small town of Calexico located along the approximate center of the proposed project site. A small airport and a closed golf course (International Country Club) are located to the west of Calexico. Land to the east of Calexico is primarily used for agriculture. An unimproved road runs along the border throughout the entire project limits.

3.2 Biological Resources

3.2.1 Vegetation

The most common vegetation in this area is *Eucalyptus* sp., which is a non-native tree. Other vegetation within the proposed construction site is characteristic of Sonoran desertscrub (Brown 1982) including mesquite (*Prosopis glandulosa*), saltbush (*Atriplex canescens*), yucca (*Yucca* sp.), and creosotebush (*Larrea tridentata*). Vegetation density of the project area is very low, with most of the area being almost void of vegetation.

3.2.2 Wildlife

Mammals within the project area are more commonly rodents which include deer mouse (*Peromyscus maniculatus*), western harvest mouse (*Reithrodontomys montanus*), desert kangaroo rat (*Dipodomys deserti*), and whitetail antelope squirrel (*Ammospermophilus leucurus*). Other mammals that are likely to occur within the area are the desert cottontail (*Sylvilagus auduboni*), blacktail jackrabbit (*Lepus californicus*), coyote (*Canis latrans*), striped skunk, (*Mephitis mephitis*), and racoon (*Procyon lotor*).

Snakes and lizards are the primary reptiles in this area. Representative species of reptiles are the gopher snake (*Pituophis melanoleucus*), Texas longnose snake (*Rhinocheilus lecontei*), side-blotched lizard (*Uta stansburiana*), twin-spotted spiny lizard (*Sceloporus magister*), and longnose leopard lizard (*Gambelia wislizenii*).

Birds are typical of the desert environment and associated habitats. Common species include the common ground dove (*Columbina passerina*), mourning dove (*Zenaida macroura*),

quail (*Callipepla californica*), common poorwill (*Phalaenoptilus nuttallii*), black-throated sparrow (*Amphispiza bilineata*), American kestrel (*Falco sparverius*), red-tailed hawk (*Buteo jamaicensis*), and turkey vulture (*Cathartes aura*).

3.2.3 Threatened and Endangered Species

A list of Federally threatened, endangered, and proposed species which may occur in the project area was received from the USFWS (Appendix A). There are seven listed species of amphibians, birds, and mammals that could potentially occur within or near the proposed project area. Habitat requirements and reasons for decline are summarized in Table 3-1.

3.3 Cultural Resources

3.3.1 Cultural Overview

Because little ethnographic and prehistoric archeological work has been conducted in the inland areas of Southern California in recent decades, Kroeber's landmark *Handbook of the Indians of California* (1925) remains the best general work for the project area. Moratto's (1984) review of the archeology of California contains important discussions of the prehistory of the region, as does Chartkoff and Chartkoff's (1984) similar review. What follows is a generalized, abbreviated summary of the cultural history of the Imperial Valley region.

The earliest accepted archeological manifestation of Native Americans in Southern California is the San Dieguito complex, dating to approximately 10,000 years ago (Warren 1967). San Dieguito was originally defined by Rogers (1939); Warren published a clear synthesis of the complex in 1967. The material culture of the San Dieguito complex consists primarily of scrapers, scraper planes, choppers, large blades, and large projectile points. Hunting was an important subsistence practice, but evidence suggests the exploitation of common plant foods such as screw-bean and mesquite beans as well; such exploitation continued throughout the prehistory of the region. Although Chartkoff and Chartkoff (1984) refer to it as Early Archaic, San Dieguito is chronologically equivalent to Paleoindian complexes across North America. Contemporaneous with the San Dieguito occupation of the area was the occupation by the Lake Mojave complex, a very similar culture considered by some to be a regional variant of San Dieguito (e.g., Warren 1967, 1968).

Table 3-1

Habitat Requirements and Reasons for Decline
of Federally Endangered, Threatened, and Proposed Endangered Species
Potentially Occurring near Calexico, California

Common/Scientific Name	Status	Habitat Requirements/Reasons for Decline
<u>Amphibians</u>		
Southwestern arroyo toad <i>Bufo microscaphus californicus</i>	E	washes, streams, and arroyos / habitat loss
California red-legged frog <i>Rana aurora draytoni</i>	T	deep water pools / habitat loss, competition, predation
<u>Birds</u>		
Southwestern willow flycatcher <i>Empidonax traillii eximius</i>	E	mountain meadows, upland pastures / habitat loss, brood parasitism
Peregrine falcon <i>Falco peregrinus</i>	E	wetlands, woodlands, cliffs, and coastal habitats / pesticides, habitat loss, shooting
Least Bell's vireo <i>Vireo bellii pusillus</i>	E	willow-dominated brush / destruction of riparian woodlands, brood parasitism
Bald eagle <i>Haliaeetus leucocephalus</i>	T	reservoirs, lakes, and rivers / habitat loss, pesticides, shooting, human disturbance
<u>Mammals</u>		
Peninsular bighorn sheep <i>Ovis canadensis cremnobates</i>	PE	desert slopes below 4,000 feet / high lamb mortality due to disease

Source: U.S. Fish and Wildlife Service 1997.

Legend: E = Federal Endangered
 T = Federal Threatened
 PE = Federal Proposed Endangered

Occupation of the Imperial Valley region was sparse during San Dieguito/Lake Mojave times, and remained so thereafter. Approximately 5,000 years ago, the Lake Mohave tradition gave rise to the Pinto (Moratto 1984) or Pinto Basin (Chartkoff and Chartkoff 1984) tradition. A Late Archaic adaptation, Pinto period material culture is characterized by thick-stemmed, distinctive dart-point styles, manos and milling stones, choppers, hammerstones, scrapers, and scraper planes. According to Moratto (1984), the Pinto culture was supplanted by the Gypsum Period culture about 4,000 years ago; this period is marked by the presence of large leaf-shaped Elko/Humboldt series dart points, rectangular based knives, T-shaped drills, and the common use of milling stones and manos. The bow and arrow was introduced into the region toward the end of the Gypsum period, as was pottery, which was traded from the Anasazi regions to the east. Approximately 1,500 years ago, the Gypsum cultures evolved into the diversified Saratoga Springs Period peoples, who lingered until approximately 800 years ago. Saratoga Springs assemblages are dominated by smaller Rose Spring/Eastgate series arrow points; ceramic assemblages include more local types produced by the Hakataya peoples, although the Anasazi influence was still felt.

Hayataka influence continued into the subsequent Protohistoric period, which lasted until after the Spanish claimed the area some 500 years ago. Brown and Buff wares from western Arizona appeared early in the period, in association with Desert Side-notched and Cottonwood point styles. The groups occupying the region appear to have belonged to the Yuman linguistic root stock and were of Hakataya origin, and apparently represented the ancestors of the historic Cupeño, Cahuilla, possibly the Kamia, and some groups of the Diegueño (Kroeber 1925).

The prehistoric period came to an abrupt end when Southern California was claimed by Spain in the early 1500s. Initial Spanish exploration during the sixteenth and seventeenth centuries left most Native Californian cultures undisturbed, but foreshadowed what was to come. Given Spain's massive New World holdings, the native populations had several centuries' reprieve before this portion of the continent was colonized; however, by 1769 San Diego Mission and the Presidio had been established at the site of present-day San Diego, on the coast about 100 km west of Calexico, and colonization was well underway by 1770. In the succeeding decades (as was the case throughout both North and South America), the native populations were all

but destroyed by newly-imported European diseases and by military aggression on the part of the colonists. By 1822, California had been acquired by Mexico; after a revolt in 1848, it was ceded to the United States. The influx of American settlers during the 1849 gold rush resulted in California entering the Union as the thirty-first state in 1850. Few if any Native American groups currently occupy this portion of the Colorado Desert; the nearest bands are located in eastern San Diego County, and include various offshoots of the Kumeyaay branch of the Diegueño Indians, most prominent of which are the Campo, Manzanita, and Viejas.

3.3.2 Previous Cultural Resources Investigations

A record search at the Southeast Information Center in Ocotillo revealed six known sites within 1 mi (1.6 km) of the project area, all of which were individually reported and were not elaborated upon in published reports. All are historic, and five consist of linear features: an old road segment, two segments of old U.S. military telegraph lines, and two canals. Site CA-IMP-3319H is recorded as an old road segment, based on field notes from an 1880 survey by one S.W. Blunt of the U.S. Government Land Office (USGLO). It is recorded as “previously destroyed;” the property currently at this location is Calexico’s Cross Street. Site CA-IMP-3320H, which falls alongside CA-IMP-3019, consists of the location of an old U.S. military telegraph, which also no longer exists. Both the previously-discussed sites lie west of downtown Calexico. Site CA-IMP-3499H is another segment of U.S. military telegraph line, located in the northwest portion of downtown Calexico, southeast of CA-IMP-3319H and CA-IMP-3320H. Again this site was identified on the basis of S.W. Blunt’s 1880 USGLO survey notes. There is no indication of the condition of the site, but it is likely that it has been destroyed as well.

Site CA-IMP-6906H, which lies about 1 km east of Calexico, is recorded as the C-M and Bravo Ranch Headquarters. This site lies immediately north of the proposed project area, and consists of the remains of a ranch operation founded in 1902. The site has been recommended for nomination to the National Register and California Historic Landmarks Registry, but the proposed nominations have not yet been initiated.

The remaining two sites are both canals. Site CA-IMP-7130H consists of the All-American Canal (which marks the extreme west edge of the project area) and associated features. Initial

construction began on the canal in 1934; it was complete by 1940. Similarly, the New Briar Canal, which marks the east edge of the project area and is recorded as site CA-IMP-7667H, was constructed in 1941.

3.3.3 Known Cultural Resources Properties

No known cultural resources properties are currently known to exist within the project area. Correspondence with the Office of Historic Preservation is included in Appendix A.

3.3.4 Newly Recorded Sites

No new sites are known for the project area. After a visual examination of the project area, it was decided that no survey would be conducted due to the area's extremely disturbed nature.

3.4 Socioeconomics

3.4.1 Population

The region of influence (ROI) for the road and fence construction project includes Imperial County in southeastern California. Total population of the ROI in 1994 was 137,100 which represents an annual growth rate of 3.3 percent over the 1984 population of 99,300. The ROI population is distributed 67.3 percent white and 2.4 percent black, while the remaining 30.3 percent are of different ethnic backgrounds. Persons of Hispanic Origin, which can be of any race, make up 65.8 percent of the ROI population.

The latest population estimate for the town of Calexico was 18,633 persons in 1990. The population of Calexico is distributed 67.8 percent white and 0.2 percent black, while the remaining 32 percent are of different ethnic backgrounds. Persons of Hispanic Origin constitute 95.6 percent of the population in Calexico which is significantly higher than the remainder of the ROI. Other towns in the area include: El Centro, with a population of 31,384 persons; and Heber, with a population of 2,566 persons (U.S. Department of Commerce 1994).

3.4.2 Employment and Income

Total employment for the ROI in 1994 was 57,351 which represents an annual growth rate of 3.0 percent over total employment in 1984. Employment in the ROI is concentrated in the government, service, and retail trade sectors which combined to represent 56.5 percent of total employment in 1994. The largest employment sector is the government which accounts for 22.1 percent of the total. Compared to national figures, the government sector in the ROI is significantly larger than the national share of 15.0 percent, while the percentage of persons in the service industry in the ROI is less than the national average. The ROI unemployment rate in October 1995 was 29.9 percent which was significantly higher than the state and national averages.

Total personal income for the ROI in 1994 was \$1.5 billion. The leading sectors for income are the same as those of employment with the exception of the farm industry which accounts for 16.7 percent of income and only 8.7 percent of employment. Government, services, and farming produce 60 percent of the income in the region. The government sector is the largest income sector, accounting for 28.7 percent of income. The transportation and public utilities industry is the fastest growing income and employment sector with annual growth rates of 5.4 percent for income and 5.2 percent for employment from 1984 to 1994. The rapid growth of the transportation industry is expected to continue in the ROI as the effects of the North American Free Trade Agreement are fully realized. Per capita personal income was \$14,302 in 1994 which was significantly lower than the national average of \$21,696.

3.5 Air Quality

The major factor affecting air quality near Calexico is wind-blown dust and pollutants. Imperial County is in attainment for all National Ambient Air Quality Standards, except particulate matter (U.S. Army 1994). Imperial County has a moderate classification regarding particulate matter.

3.6 Water Resources

The only natural surface water is the New River which runs near the western edge of Calexico. However, a large percentage of water within this river is siphoned into the All American Canal

1-2 miles before it reaches Calexico. The All American Canal comprises the eastern and western limits of the proposed project area. There are several other canals in the surrounding area which provide irrigation for agricultural purposes.

Groundwater in southern California is supplied from two aquifers: the Basin-Fill and the Alluvium and Older Sediments (U.S. Army 1994). Common sources of contamination of groundwater include irrigation return flow, application of pesticides, improper waste disposal, and untreated wastewater.

4.0 ENVIRONMENTAL CONSEQUENCES

4.1 Proposed Action

4.1.1 Land Use

The new fence would be constructed in the same location as the existing fence, which would be removed concurrent with new fence construction. The ditch adjacent to the border road on the western side of Calexico is not used, therefore, filling this ditch to enable construction activities will not result in a significant land use change. Overall, land use would not be altered by fence construction and impacts are expected to be minimal.

4.1.2 Biological Resources

4.1.2.1 Vegetation

Some vegetation would be removed, or directly impacted during construction activities. However, little vegetation is present in the project area, and the most common vegetation is non-native, so impacts to vegetation are expected to be minimal. After fence construction is completed, areas surrounding the fence would be allowed to revegetate.

4.1.2.2 Wildlife

No wildlife habitat is expected to be lost with the slight decrease in vegetation. Habitat removal and disturbance may displace some common wildlife species. However, displacement and disturbance of wildlife would be temporary and insignificant.

4.1.2.3 Threatened and Endangered Species

No threatened or endangered species were observed during recent surveys of the proposed project area (GMI 1997). In addition, water and vegetation resources in the project area have been highly degraded and impacted by human activities. Specific habitats such as willow-dominated brush, wetlands, deep water pools, desert slopes, woodlands, and cliffs are not present in the project area. Therefore, habitat requirements for the listed species are not met, and no impacts to threatened or endangered species are expected due to the proposed project.

4.1.3 Cultural Resources

A records search of the proposed impact area resulted in the identification of no sites within the project area; similarly, a visual examination of the project area yielded no observed cultural resources. However, there is always a possibility that buried sites may occur in the project area. Although no sites are currently known, it is recommended that archeological monitoring be conducted during the more invasive phases of the proposed work. Such procedures would ensure that the proposed action would have no effect on the cultural resources of the region.

4.1.4 Socioeconomics

The fence construction project would provide direct economic benefits to the companies and employees involved in construction and, through economic multiplier effects, benefits to the broader economy. The impacts on socioeconomic resources in the region of influence (ROI) will be discussed in the following sections. Specific characteristics to be discussed are population, employment, income, and business sales.

Construction activities associated with the fence construction project would have insignificant impacts on population. The construction would be performed by 300 troops which would be transferred until completion of the project. Any additional hiring would most likely occur within the local area. Thus, construction of the border fence would not induce permanent in- or out-migration to the ROI, and as a result, population would not be impacted.

Direct expenditures of the fence construction would have direct impacts on employment, income, and sales within the ROI. Most labor and some materials would be brought into the local area, however some expenditures are expected to occur within the ROI. The expenditures which do occur within the ROI are subject to economic multipliers.

The direct impacts from locally hired labor and locally purchased materials would have indirect and induced multiplier impacts that can be estimated using economic multiplier models such as the Economic Impact Forecast System (EIFS) developed by researchers at the U.S. Army Corps of Engineers, Construction Engineering Research Laboratory (CERL). EIFS provides a methodologically sound analytical method for assessing the magnitude and significance of potential socioeconomic impacts of proposed activities on economic areas as small as the

county level. The model generates regional multipliers used for estimating total (direct, indirect and induced) impacts on regional economic output, employment, and earnings.

Impact analysis conducted for Imperial County using the EIFS model shows an overall economic multiplier of 1.68. The multiplier indicates the total impact of a project as estimated from direct expenditures. For example, if the direct expenditure of a project is \$500,000 and the multiplier for the ROI is 2.0, then the total impact on sales within the affected area would be \$1,000,000. Areas with large populations and diverse economies have high multipliers, while rural areas with small population densities and narrow economic bases have small multipliers since needed labor and materials must be imported to the area. The economic multiplier generated for Imperial County is typical for a rural county area with a narrow economic base.

The total cost of the fence construction project is not known at this time, however similar construction projects have been performed in the area. Due to the relative size of the ROI economy, this type of construction activity would be expected to provide a positive but insignificant economic stimulus. The impacts from this type of construction would easily be absorbed into the broader economy.

4.1.4.1 Environmental Justice

Executive Order 12898 of 11 February 1994 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," provides that each U.S. Federal agency shall identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low income populations in the United States. The project site is located near a small urban area with similar characteristics of the broader ROI. The project only involves modifications to existing fence. Therefore, no disproportionately high and adverse impacts on minority and low income populations are expected. Under the definition of Executive Order 12898, there would be no adverse environmental justice impacts.

4.1.5 Air Quality

Use of front endloaders, forklifts, welders, and graders during fence construction would produce additional air pollutants (i.e., dust, carbon monoxide). Due to the limited duration of construction, the short-term addition of pollutants from construction activities would only minimally impact the area.

4.1.6 Water Resources

Water resources are extremely limited within the project area. New River is the only surface waterway that would possibly be affected by the proposed action. Minor soil erosion from short-term construction activities and loss of vegetation adjacent to New River is expected to minimally impact water quality.

The primary water quality concern would be the potential of release of toxic materials such as diesel fuel, oil, and other hazardous materials due to spills or improper disposal. By following methods outlined in the Storm Water Pollution Prevention Plan (Appendix B), impacts are not expected.

4.2 No Action Alternative

The no action alternative would essentially result in the status quo for the U.S. Border Patrol. The no action alternative would not result in any significant impacts to natural or cultural resources. The no action alternative would not include any changes in employment or construction and would therefore have no affect on socioeconomic parameters. The no action alternative would have no affect on population, income, employment, or business activity. Benefits from the proposed fence construction would not occur as a result of the no action alternative.

4.3 Cumulative Impacts

The Council of Environmental Quality defined cumulative impact as the incremental impact of multiple present and future actions with individually minor but collectively significant effects. Cumulative impact can be concisely defined as the total effect of multiple land uses and developments, including their interrelationships, on the environment (Bain *et al.* 1986).

In order to evaluate cumulative effects of the past and present border road and fence repair projects, EAs from previous and current border road repair operations in the region, and the PEIS developed for all JTF-6 activities along the U.S.-Mexico border were reviewed. An analysis of each component of the affected environment was completed from the existing EAs in order to identify which would have cumulative impacts as a result of the past and proposed road and fence construction activities. Water and biological resources (i.e., vegetation and wildlife habitat) would be slightly to moderately affected by cumulative impacts associated with the past and proposed road and fence construction projects.

The primary cumulative effect of the past and proposed road and fence projects is permanent loss of vegetation and associated wildlife habitat. Overall, a total of about 2,400 acres of vegetation, mostly semidesert grassland and desert scrub communities, has been removed by JTF-6 road, range, fence, and helipad repair and construction activities along the entire U.S.-Mexico border (California to Texas). This represents less than 0.01 percent of the total land area within the area along the entire U.S. - Mexico border. Soil losses have been minimized through the implementation of erosion control measures. Although the amount of soils saved is not quantifiable, JTF-6 operations have reduced extant erosion problems in numerous locations. Air emissions have been produced by vehicles, aircraft, and heavy equipment; however, these have not resulted in significant cumulative impacts due to the short duration of the activities, the dispersion capabilities of the region, and the remote locations of most of the operations. Construction and maintenance activities have had cumulative positive impacts on socioeconomic resources within the border area and the nation through reductions in illegal drug smuggling activities.

5.0 ENVIRONMENTAL DESIGN MEASURES

This section describes the measures that may be implemented to eliminate/mitigate potential significant adverse impacts of proposed fence construction. These measures and guidelines may be incorporated as part of the proposed action. During construction of the fence, construction crews would maintain a minimum construction width to avoid impacting a large area. Following construction, areas surrounding the fence would be allowed to revegetate to reduce erosion. Existing roads would be utilized when available, rather than building new roads and further impacting the project area.

Although unlikely, a hazardous materials spill (i.e., fuel spill) could occur during proposed construction. Any major fuel spill would be contained by immediately constructing an earthen dike and applying a petroleum absorbent (i.e., granular, pillow, sock, etc.) to absorb and contain the spill. In addition, any major spill would be reported immediately to appropriate federal and state agencies. A hazardous materials site assessment would be conducted after a spill in order to identify potential problems, additional clean-up procedures, and if necessary, mitigative measures. This would include disposal of the absorbent in accordance with all federal and state regulations.

6.0 PUBLIC INVOLVEMENT

6.1 Agency Coordination

This chapter discusses consultation and coordination that occurred during preparation of this document. This includes contacts made during development of the proposed action, elimination of alternatives, and writing of the EA. Formal and informal coordination has been conducted with the following agencies:

- U.S. Army Corps of Engineers (Ft. Worth and Los Angeles Districts),
- Joint Task Force Six (JTF-6),
- Immigration and Naturalization Service (INS; U.S. Border Patrol),
- State Historic Preservation Office,
- Bureau of Land Management (BLM),
- U.S. Fish and Wildlife Service (USFWS), and
- U.S. Section, International Boundary and Water Commission.

6.2 Public Review

The draft EA was made available for public review. The Notice of Availability (NOA) is included in Appendix A. No comments were received concerning the draft EA or FONSI.

7.0 REFERENCES

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8.0 LIST OF ACRONYMS/ABBREVIATIONS

CERL	Construction Engineering Research Laboratory
DoD	Department of Defense
EA	Environmental Assessment
EIFS	Economic Impact Forecast System
E.O.	Executive Order
GMI	Geo-Marine, Inc.
INS	Immigration and Naturalization Service
JTF-6	Joint Task Force Six
LEA	Law Enforcement Agencies
NDCS	National Drug Control Strategy
NEPA	National Environmental Policy Act
NRHP	National Register of Historic Places
PEIS	Programatic Environmental Impact Statement
ROI	Region of Influence
ROW	Right-of-way
USCOE	U.S. Army Corps of Engineers
USGLO	U.S. Government Land Office
USFWS	U.S. Fish and Wildlife Service

9.0 LIST OF PREPARERS

The following people were primarily responsible for preparing this Environmental Assessment.

<u>NAME</u>	<u>AGENCY/ORGANIZATION</u>	<u>DISCIPLINE/ EXPERTISE</u>	<u>EXPERIENCE</u>	<u>ROLE IN PREPARING EA</u>
Mr. Chris Beacham	Geo-Marine, Inc.	Socioeconomics	5 years economic analyses and EA/EIS studies, Geo-Marine, Inc.; 6 years economic studies, Gulf Engineers and Consultants	Socioeconomic resources, environmental justice, and impact analysis
Mr. Milton Blankenship	JTF-6	Geology/ Hazardous Materials	12 years geology, HAZMAT management, and geohydrology	EA coordination and review
Mr. Floyd Largent	Geo-Marine, Inc.	Archaeology	3.5 years of EA/EIS studies, Geo-Marine, Inc.; 8 years archeology, cultural resource management in general	Cultural resources and impact analysis
Mr. Greg Flournoy	Geo-Marine, Inc.	Geology	1 year PPPs, 1.5 years EBS/EDDA, Geo-Marine Inc.	Pollution Prevention Plan

<u>NAME</u>	<u>AGENCY/ORGANIZATION</u>	<u>DISCIPLINE/ EXPERTISE</u>	<u>EXPERIENCE</u>	<u>ROLE IN PREPARING EA</u>
Mr. Chris Ingram	Geo-Marine, Inc.	Biology/Ecology	6 years EIS studies, Geo-Marine, Inc.; 2 years EIS studies, Sunbelt Research Corporation; 7 years EIS studies, Gulf South Research Institute; 2 years EIS studies, Gulf Engineers and Consultants	EA review
Mr. Blake Smiotanski	Geo-Marine, Inc.	Biology/Ecology	2 years EA/EIS studies, Geo-Marine, Inc.	Project manager and EA preparation
Mr. Brent Tebbets	Geo-Marine, Inc.	Socioeconomics	2 years economic analyses and EA/EIS studies, Geo-Marine, Inc.	Socioeconomic resources and impact analysis
Mr. Dwayne Templet	Geo-Marine, Inc.	Forestry/NEPA coordination	6 years EIS studies, Geo-Marine, Inc.	Project manager and EA review
Mr. Eric Verwers	Ft. Worth Corps of Engineers	Biology	10 years environmental impact assessment for Federal projects and 5 years wildlife restoration, Ft. Worth District	Contract manager and EA review and coordination

APPENDIX A

CORRESPONDENCE



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Field Office
2730 Loker Avenue West
Carlsbad, California 92008

January 8, 1997

Mr. Paul Hathorn
Chief, Environmental Resource Branch
Department of the Army
Fort Worth District, Corps of Engineers
P.O. Box 17300
Fort Worth, Texas 76102-0300

Attn: Mr. Eric Verwers

Re: Request for Proposed, Threatened, or Endangered Species for the Two Proposed Road and Fence Construction/Upgrades near Calexico and Campo, California (1-6-97-SP-42)

Dear Mr. Hathorn:

The Fish and Wildlife Service (Service) has reviewed the information provided in your letter, dated December 13, 1996, in an effort to assess the potential for the occurrence of federally listed threatened or endangered species on the project site. In an effort to assist you in evaluating the potential for conflicts between threatened and/or endangered species and the proposed project, we are providing the following list which contain species that occur in the general area. The enclosed list of species partially fulfills the requirements of the Service under section 7 of the Endangered Species Act of 1973, as amended (Act).

Section 7(a)(2) of the Act requires a Federal agency, in consultation with, and with the assistance of the Service, to insure that any action it authorizes, funds, or carries out, is not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of critical habitat. To meet this requirement, biological assessments are required under section 7 of the Act if listed species or critical habitat may be present in the area affected by any major construction activity¹. If a biological assessment is not required, your agency still has the responsibility to review its proposed activities and determine whether listed species will be affected. Moreover, "action" means all activities or programs of any kind authorized, funded,

¹ "Construction Activity" means any Federal action which significantly affects the quality of the human environment designed primarily to result in the building or erection of man-made structures such as dams, buildings, roads, pipelines, channels, and the like. This includes Federal actions such as permits, grants, licenses, or other forms of Federal authorizations or approvals which may result in construction.

Mr. Paul Hathorn (1-6-97-42)

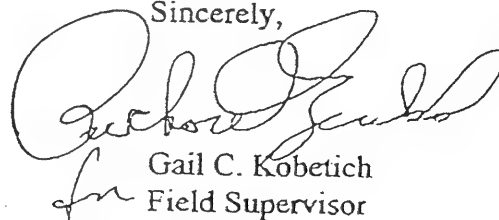
or carried out, in whole or in part, by Federal agencies. In addition, "action area" means all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action.

Section 7(d) of the Act prohibits Federal agencies and applicants from making any irreversible or irretrievable commitment of resources which has the effect of foreclosing the formulation or implementation of reasonable and prudent alternatives which would avoid jeopardizing the continued existence of listed species or resulting in the destruction of critical habitat. During the assessment or review process, you may engage in planning efforts, but may not make any irreversible commitment of resources. Such a commitment could constitute a violation of section 7(d) of the Act. If a listed species may be adversely affected, agencies should request, in writing through our office, formal consultation pursuant to section 7(a)(2) of the Act. Informal consultation should be used to exchange information and resolve conflicts with respect to listed species prior to a written request for formal consultation.

When it is determined that a proposed action is likely to jeopardize the continued existence of any proposed species or result in the destruction or adverse modification of proposed critical habitat, a Federal agency is required to initiate a conference with the Service. Conferences are informal discussions between the Service and the Federal agency, designed to identify and resolve potential conflicts between an action and proposed species or proposed critical habitat at an early point in the decision making process. The Service makes recommendations, if any, on ways to minimize or avoid adverse effects of the action. The conference process fills the need to alert Federal agencies of possible steps that an agency might take at an early stage to adjust its actions to avoid jeopardizing a proposed species.

We want to closely coordinate with the Federal agency and applicant during the preparation of the biological assessment. Our goal would be to provide technical assistance that identifies specific features that could be incorporated into the project description to avoid adverse impacts to listed species. Should you have any questions regarding the species listed or your responsibilities under the Act, please contact Ann Kreager of my staff at (619) 431-9440.

Sincerely,



Gail C. Kobetich
Field Supervisor

Listed Endangered, Threatened,
and Proposed Species that May Occur in the
Campo and Calexico, California Area

January 9, 1997

Common Name	Scientific Name	Status
<u>Listed Species</u>		
<u>AMPHIBIANS</u>		
southwestern arroyo toad	<u>Bufo microscaphus californicus</u>	E
California red-legged frog	<u>Rana aurora draytoni</u>	T
<u>BIRDS</u>		
southwestern willow flycatcher	<u>Empidonax traillii extimus</u>	E
peregrine falcon	<u>Falco peregrinus</u>	E
least Bell's vireo	<u>Vireo bellii pusillus</u>	E
bald eagle	<u>Haliaeetus leucocephalus</u>	T
<u>MAMMALS</u>		
peninsular bighorn sheep	<u>Ovis canadensis cremnobates</u>	PE
E:	Endangered	
T:	Threatened	
PE:	Proposed Endangered	

OFFICE OF HISTORIC PRESERVATION

DEPARTMENT OF PARKS AND RECREATION

P.O. BOX 942896

SACRAMENTO 94296-0001

(916) 663-6624

FAX: (916) 663-4824

March 3, 1997

REPLY TO: COE970303Z

Mike Ensich, Chief, Environmental Division
U.S. Army Corps of Engineers
Fort Worth District
CESWF-EV-EC
P. O. Box 17300
FORT WORTH TX 76102-0300

Project: International Border Fence and Road Construction, JTF-6 and U.S.
Border Patrol

Dear Mr. Ensich:

Thank you for requesting my views on the cited undertaking. Based on staff review of the documentation you submitted, I would like to offer the following comments on the actions you have taken to comply with Section 106 of the National Historic Preservation Act.

The reports indicate that reasonable measures were taken to identify historic properties within the project's APE. Your efforts to identify historic properties conform to applicable standards. No historic properties were identified within the APE of your undertaking.

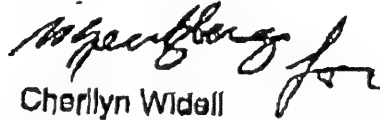
Based on the foregoing finding and the agreement that staging of equipment or supplies will not take place within the boundaries of CA-IMP-6906H, I have no objection to your determination that this undertaking will not affect historic properties as it is currently designed. Your agency may have additional Section 106 responsibilities under certain circumstances set forth in 36 CFR 800.

For your future reference, I have enclosed a list of the Information Centers of the California Historical Resources Information System. These offices maintain some of the information you need in order to assess information needs under 36 CFR 800.4(a). Also, when you request the views of the State Historic Preservation Officer under 36 CFR 800, please address your correspondence to Cheryl Widdell, State Historic Preservation Officer, P. O. Box 942896, Sacramento, CA 94296-0001.

Mike Enschi
March 3, 1997
Page two

Your consideration of historic properties in the project planning process is appreciated. If you have any questions regarding our review of this undertaking, please call Gary Reinobehl of my staff at (916) 653-5089.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cheryllyn Widell".

Cheryllyn Widell
State Historic Preservation Officer

PROOF OF PUBLICATION

(2015.5 C.C.P.)

STATE OF CALIFORNIA

County of Imperial

I am a citizen of the United States and a resident of the County
foresaid; I am over the age of eighteen years, and not a party
or interested in the above entitled matter. I am the principal
clerk* of the printer of the

IMPERIAL VALLEY PRESS

SOUTH COAST EDITION

a newspaper of general circulation, printed and published daily in
the City of El Centro, County of Imperial and which newspaper
has been adjudged a newspaper of general circulation by the
Superior Court of the County of Imperial, State of California,
under the date of October 9, 1951, Case Number 26775; that the
notice, of which the annexed is a printed copy, has been published
in each regular and entire issue of said newspaper and not in any
supplement thereof on the following dates, to-wit:

806
February 14

all in the year 1997

I certify (or declare) under penalty of perjury that the
 foregoing is true and correct.

Katricia Garcia

SIGNATURE

* Printer, Foreman of the Printer, or Principal Clerk of
the Printer.

Date February 14, 1997
at El Centro, California.

This space is for County Clerk's Filing Stamp

Proof of Publication of

LEGAL ADVERTISEMENT

NOTICE OF AVAILABILITY
FOR THE DRAFT ENVIRONMENTAL
ASSESSMENT ON JTF-6 BORDER FENCE
MAINTENANCE AND CONSTRUCTION,
IMPERIAL COUNTY, CALIFORNIA

The public is invited to comment on the Draft
Environmental Assessment (EA) concerning border
fence maintenance and construction, Imperial County,
California. The Draft EA was prepared for the U.S.
Border Patrol and Joint Task Force Six (JTF-6) by the U.S.
Army Corps of Engineers, Fort Worth District.

The proposed action would facilitate the U.S. Border
Patrol's mission to reduce illegal drug activity along the
border in the Calexico/Mexicali area. The proposed
action would involve replacing existing chainlink fence
with landing mat fence which is more resistant to
cutting.

Copies of the Draft EA, "JTF-6 Border Fence
Construction and Maintenance, Calexico, California" are
available upon written request to the U.S. Army Corps of
Engineers, Fort Worth District, CESWF-PL-RE, P.O. Box
17300, Fort Worth, Texas 76102-0300. Copies of the Draft
EA may be viewed at the Calexico Library located at 608
Heber Ave., Calexico, CA 92231-2840, and the El Centro
Public Library located at 539 State Street, El Centro, CA
92243-2928.

Written comments must be received no later than 12
March 1997. Send written comments to Mr. Eric
Verwers, CESWF-PL-RE, U.S. Army Corps of Engineers,
Fort Worth District, P.O. Box 17300, Fort Worth, Texas
76102-0300. Or call Mr. Verwers at 817-978-2370 for
further information.

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APPENDIX B

STORMWATER POLLUTION PREVENTION PLAN

STORM WATER POLLUTION PREVENTION PLAN

FOR JTF-6 BORDER FENCE

CONSTRUCTION AND MAINTENANCE

CALEXICO, IMPERIAL COUNTY, CALIFORNIA

MARCH 1997

OWNER CERTIFICATION FOR
CALEXICO JTF-6 BORDER FENCE CONSTRUCTION PROJECT
CALEXICO, IMPERIAL COUNTY, CALIFORNIA

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

2/19/97
Date Certified

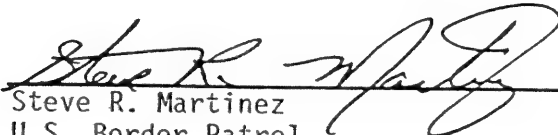

Steve R. Martinez
U.S. Border Patrol

TABLE OF CONTENTS

	<u>Page</u>
1.0 INTRODUCTION.....	1
1.1 Description.....	1
1.1.1 Soils and Soil Properties.....	1
1.1.2 Site Area.....	3
1.1.3 Name of Receiving Waters.....	3
2.0 SEQUENCE OF MAJOR ACTIVITIES	4
2.1 Controls.....	4
2.1.1 Erosion Sediment Controls	4
2.1.2 Waste Disposal Controls.....	4
2.2 Timing of Controls/Measures	6
3.0 MAINTENANCE AND INSPECTION PROCEDURES	7
3.1 Inventory for Pollution Prevention Plan	7
3.2 Spill Prevention.....	7
3.2.1 Best Management Practices.....	7
3.2.2 Product-Specific Practices.....	8
4.0 CERTIFICATION OF COMPLIANCE WITH LOCAL, STATE AND FEDERAL REGULATIONS.....	9

ATTACHMENTS

Attachment #1 - Notice of Intent (NOI) for Construction Activity

Attachment #2 - Inspection and Maintenance Report Form (Rainfall Event)

Attachment #3 - Inspection and Maintenance Report Form (Sediment Basin)

Attachment #4 - Inspection and Maintenance Report Form (Changes)

LIST OF FIGURES

	<u>Page</u>
Figure 1. Location of project area.	2
Figure 2. Erosion and sediment controls.	5

LIST OF TABLES

Table 1. Soil Descriptions and Hydrologic Groups	3
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1.0 INTRODUCTION

The Calexico JTF-6 Border Fence Construction Project is located in southern Imperial County, California. The project is along the U.S./Mexico international border immediately south and adjacent to Calexico, California and extends approximately 5.75 miles (Figure 1). The construction project occurs on eastern Calexico and western Heber 7.5' USGS quadrangle maps.

Owner Address: Chief Patrol Agent
1111 N. Imperial Avenue
El Centro, CA 92243

1.1 Description

The project consists of new construction of approximately 5.75 miles of fence along the international border in and around Calexico in southern Imperial County, California. The project would involve construction of landing mat and ballard fences to replace an existing fence. The existing road would be used and no road improvements are planned. Construction activities would be restricted to within 25 feet north of the parallel border road and fence. Approximately 17 acres would be potentially affected.

1.1.1 Soils and Soil Properties

The natural vegetation of the project area is a sparse growth of mesquite (*Prosopis glandulosa*), saltbush (*Atriplex canescens*), yucca (*Yucca* sp.), and creosotebush (*Larrea tridentata*). The dominant vegetation, however, is *Eucalyptus* sp., which is an introduced species. The average annual precipitation is 2.8 inches. There are several soil types within the project area. Table 1 shows the soil description and the hydrologic group as determined by the Soil Conservation Service of the United States Department of Agriculture.

The soils of the project area fall into two hydrologic groups; Group C and Group D. Group C soils have a slow infiltration rate when thoroughly wetted, are chiefly soils that have an impeding downward movement of water, are moderately fine to fine textured, and have a slow infiltration rate. These soils have a slow water transmission rate.

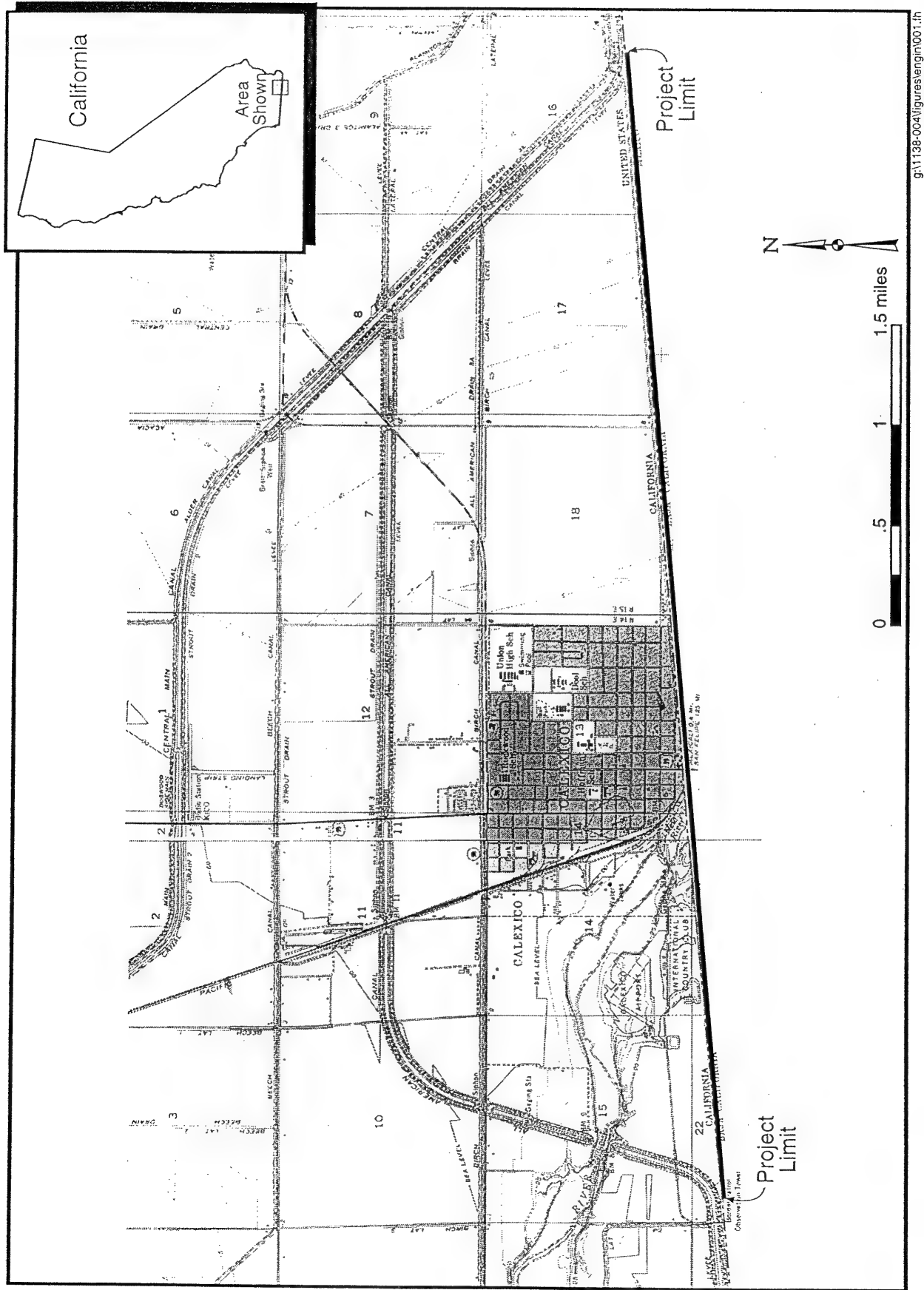


Figure 1. Location of project area.

Group D soils have a very slow infiltration rate when thoroughly wetted, are chiefly clays that have a high shrink-swell potential, and are soils that are shallow over nearly impervious material. The rate of water transmission for these soils is very slow.

The erodibility of the soils in the project area is rated as being severe except for the Meloland which is rated as moderate . This indicates that protective and corrective measures are needed before and during the time of soil use.

Table 1
Soil Descriptions and Hydrologic Groups
Calexico JTF-6 Border Road Repair Project
Imperial County, California

Soil	Hydrologic Group
Holtville, silty clay, wet, 0 to 2 percent slopes	C
Imperial, silty clay, wet, 0 to 2 percent slopes	D
Imperial-Glenbar silty clay loams, wet, 0 to 2 percent slopes	D
Imperial-Glenbar silty clay loams, 2 to 5 percent slopes	D
Meloland, very fine sandy loam, wet, 0 to 1 percent slopes	C

1.1.2 Site Area

The area to be affected by construction of new fencing is approximately 17 acres.

1.1.3 Name of Receiving Waters

The construction area follows the U.S./Mexico International Border. The drainage of the area is generally to the west-northwest with the New River being the major natural waterway. This area of Imperial County is used extensively for agriculture and has a well developed canal and tile drain system for the irrigation of the various crops (see Figure 1).

2.0 SEQUENCE OF MAJOR ACTIVITIES

The following major activities would be implemented to reduce sediment and other pollutants in storm water discharges:

- Sensitive areas containing cultural resource sites, unique habitats, rare and endangered plants and animals, and wetlands have been identified prior to the start of construction. These field-surveyed areas would be staked and flagged as areas possibly not to be disturbed by repair and/or construction activities.
- Areas disturbed by construction activities would be mulched and seeded with native and commercially developed grasses, as needed, to prevent erosion.
- Straw bale check dams and/or siltation fencing would be installed at points of water conveyance to reduce slope erosion on the construction area and reduce sediment leaving the area. Figure 2 shows erosion and sediment controls.

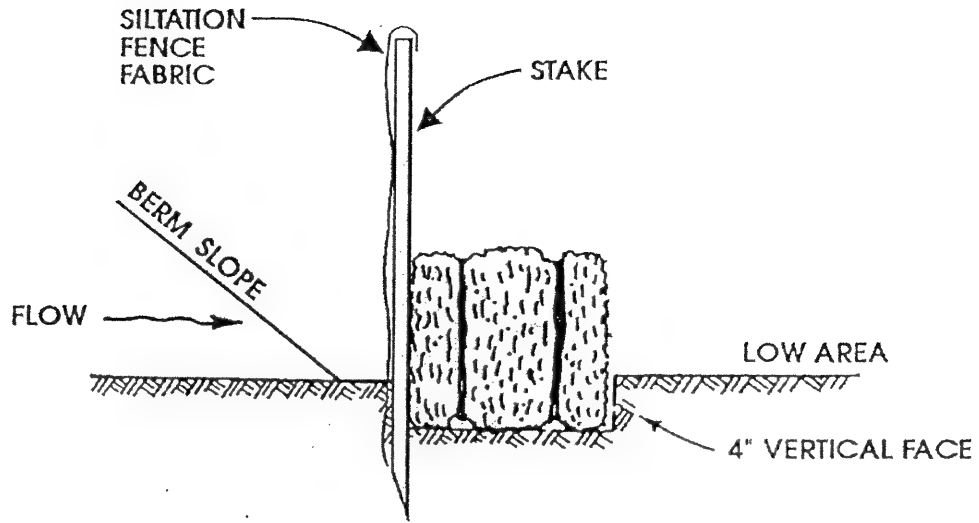
2.1 Controls

2.1.1 Erosion Sediment Controls

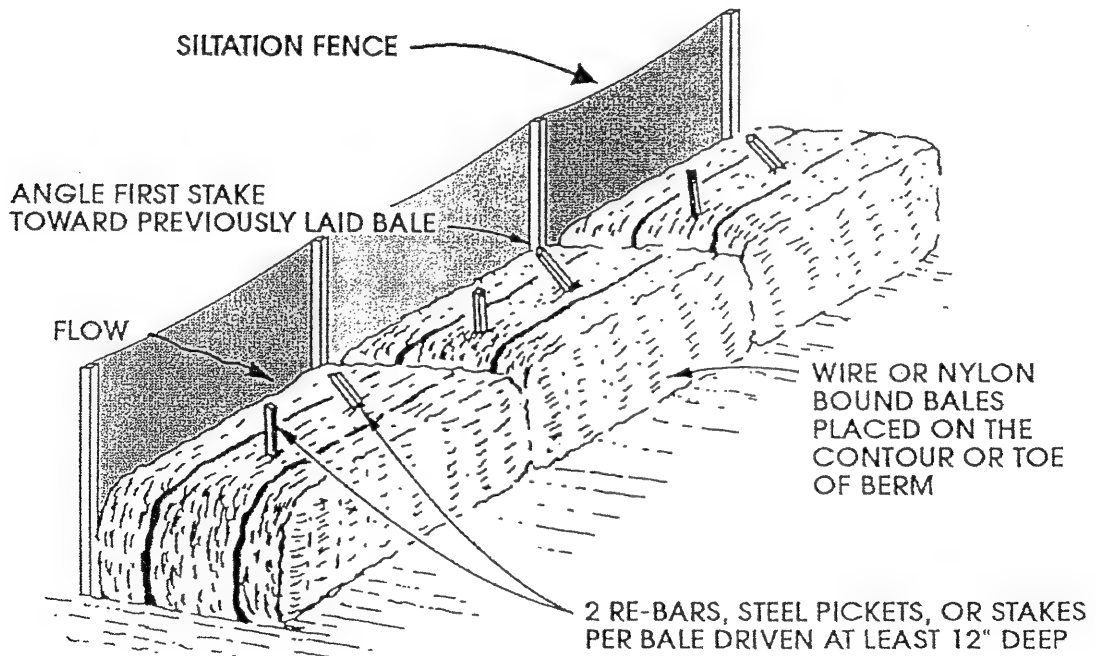
Storm Water Management: Activities would include construction of landing mat and ballard fences to replace an existing fence. The existing road would be used and no road improvements are planned. In areas requiring soil stabilization, the area below the disturbed area would be mulched and seeded, if needed, with a mixture of grass species per State of California Standard Highway Planting Specifications. Bales of straw and/or a siltation fence would be staked in low areas to control surface water and sedimentation at points of conveyance and to reduce velocity of waters discharged (see Figure 2).

2.1.2 Waste Disposal Controls

Waste Materials: All construction waste materials (brush, paper, cloth, etc.) would be collected daily, stored in containers and disposed in an approved manner or at a state-approved landfill facility. The trash storage containers would meet all local and state solid waste management regulations. Containers would



Embedding Detail
Straw Bale Barrier



Anchoring Detail
Straw Bale Barrier

Figure 2. Erosion and sediment controls.

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have secure, tight fitting lids and would be emptied as needed. All personnel participating in construction activities would be instructed on the procedure for waste disposal.

Hazardous Waste: All hazardous waste would be transported, handled, stored, and used in strict accordance with local, state, and federal regulations, and manufacturers' recommendations.

Sanitary Waste: All sanitary waste would be collected in portable units by a licensed contractor and would be disposed at a state approved facility in accordance with local and state regulations.

Off-Site Vehicle Tracking: Excess mud, dirt, or rock tracked on the public roadways would be removed daily. Excavated material would not be removed from the site.

2.2 Timing of Controls/Measures

As stated in the sequence of major activities. All clearing, grubbing, and control measures for storm water runoff would be done contemporaneously with construction activities.

3.0 MAINTENANCE AND INSPECTION PROCEDURES

A blank Notice of Intent (NOI) form is included as Attachment 1. This form is to be completed and submitted to the State of California State Water Resources Control Board (SWRCB) by the owner of the site prior to the commencement of construction. After approval by the SWRCB, the completed form is to be inserted as Attachment 1 and is thereafter considered to be a part of this storm water pollution prevention plan. All pollution prevention measures would be inspected before anticipated storm events and after such storm events to identify areas contributing to runoff and to evaluate whether their storm water pollution prevention plan measures for reducing pollutant loadings are adequate and properly implemented (Attachment 2). The inspector would thoroughly understand the requirements of the Pollution Prevention Plan (PPP) and have a basic knowledge of engineering aspects on controlling storm water and reducing runoff pollution. Areas being regraded would be inspected for erosion and soil loss from the site. Discharge points would be inspected for signs of erosion or sediment associated with the discharge. Built up sediment would be removed when it has reached one-third the height of the siltation fence. Locations where vehicles enter and leave the site would be checked for signs of off-site sediment tracking. Best Management Practices (BMPs) and pollution control maintenance procedures would be inspected for adequacy. The PPP would be revised as necessary during the construction period (Attachments 2, 3, and 4).

3.1 Inventory for Pollution Prevention Plan

The following materials have the potential to be onsite during the construction of the fence:

- Diesel Fuel
- Gasoline
- Oil
- Lubricants
- Hydraulic Fluid
- Transmission Fluid
- Marking Paint

3.2 Spill Prevention

3.2.1 Best Management Practices

The following management practices would be implemented to reduce the risk of spills and accidental exposure of materials and substances to storm water runoff:

- Good Housekeeping: No fuel and/or maintenance materials would be stored on site after working hours. All fuel, fluids, oil and lubricants would be stored aboard designated and specially manufactured service vehicles and removed from the site after working hours.
- Hazardous Materials Storage: All hazardous products would be stored in or aboard designated and specially manufactured service vehicles. The service vehicles would be present only during the time equipment is in operation and would be removed from the site after working hours.

Products would be kept in original sealed containers, and surplus materials would be removed daily after working hours.

3.2.2 Product-Specific Practices

The following product-specific practices would be implemented:

- Petroleum Products: All vehicles would be stored, repaired, and refueled on site. All vehicles would be monitored for leaks during regularly scheduled preventive maintenance actions. Petroleum products would be stored in designated and specially manufactured service vehicles. All products would be kept in original sealed containers during periods of use. All empty containers would be disposed in an approved manner. Spill containment areas would be established at staging areas throughout the road segments, and all equipment would be refueled and repaired within the staging areas. All spills would be promptly cleaned up and reported to applicable regulatory agencies. Equipment would be kept within the spill containment sites to prevent spilled material from reaching and polluting drainage ways. All personnel would be briefed on spill prevention, control, and clean-up procedures. Petroleum products would not be stored on site after working hours.

4.0 CERTIFICATION OF COMPLIANCE WITH LOCAL, STATE, AND FEDERAL REGULATIONS

The storm water pollution prevention plan was prepared in accordance with guidelines published in the State of California SWRCB, Division of Water Quality, Storm Water Permit Unit, September 8, 1992. After construction, an Environmental Protection Agency (EPA) storm water permit for industrial operations would not be required. Storm water in the project area is regulated by the State of California.

ATTACHMENTS

Attachment #1 - Notice of Intent (NOI) for Construction Activity

Attachment #2 - Inspection and Maintenance Report Form (Rainfall Event)

Attachment #3 - Inspection and Maintenance Report Form (Sediment Basin)

Attachment #4 - Inspection and Maintenance Report Form (Changes)

ATTACHMENT #1

NOTICE OF INTENT (NOI) FOR CONSTRUCTION ACTIVITY

NOTICE OF INTENT

OWNER". CONSTRUCTION / SITE INFORMATION

I. BILLING ADDRESS

IV. RECEIVING WATER INFORMATION

TATE USE ONLY

WDID: _____										Regional Board Office _____										Date Permit Issued: _____																			
NPDES Permit Number: _____										Order Number: _____										Fee Amount Received: _____										Date NOI Received: _____									
CA _____																																							

V. TYPE OF CONSTRUCTION (Check all that apply)

1. ☐ Residential 2. ☐ Commercial 3. ☐ Industrial 4. ☒ Reconstruction 5. ☐ Transportation
6. ☐ Utility 99. ☐ Other (Please List)

VI. MATERIAL HANDLING / MANAGEMENT PRACTICES

A. Types of materials that will be handled and/or stored at the site: (Check all that apply)

1. ☐ Solvents 2. ☒ Metal 3. ☒ Petroleum Products 4. ☐ Plated Products
5. ☐ Asphalt Concrete 6. ☐ Hazardous Substance 7. ☐ Paints 8. ☐ Wood Treated Products
99. ☐ Other (Please list)

B. Identify proposed management practices to reduce pollutants in storm water discharges: (Check all that apply)

1. ☐ Oil/Water Separator 2. ☒ Erosion Controls 3. ☒ Sedimentation Controls 4. ☐ Overhead Coverage
5. ☐ Detention/Desiltation Pond 99. ☐ Other (Please List)

VII. SITE INFORMATION

A. Total size of construction site

17 Acres

B. Percent of site impervious (including rooftops)

Before construction 0 % After construction 0 %

III. REGULATORY STATUS

Is the site subject to a locally approved erosion/sediment control plan? ☐ Yes ☒ No

If yes, name of local agency

IX. CERTIFICATIONS

I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment." In addition, I certify that the provisions of the permit, including the development and implementation of a Storm Water Pollution Prevention Plan and a Monitoring Program Plan, will be complied with.

Printed Name: _____

Signature: _____ Date _____

Title: _____

ATTACHMENT #2

INSPECTION AND MAINTENANCE REPORT FORM (RAINFALL EVENT)

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM

TO BE COMPLETED EVERY 7 DAYS AND WITHIN 24 HOURS OF
A RAINFALL EVENT OF 0.5 INCHES OR MORE

INSPECTOR: _____ DATE: _____

INSPECTOR'S QUALIFICATIONS:

DAYS SINCE LAST RAINFALL: _____ AMOUNT OF LAST RAINFALL _____ INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	DATE OF NEXT DISTURBANCE	STABILIZED? (YES/NO)	STABILIZED WITH	CONDITION
BLDG. A					
BLDG. B					
BLDG. C					
PRKNG. 1					
PRKNG. 2					
GRASS 1					
GRASS 2					

STABILIZATION REQUIRED:

TO BE PERFORMED BY: _____ ON OR BEFORE: _____

ATTACHMENT #3

INSPECTION AND MAINTENANCE REPORT FORM (SEDIMENT BASIN)

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM

SEDIMENT BASIN:

DEPTH OF SEDIMENT IN BASIN	CONDITION OF BASIN SIDE SLOPES	ANY EVIDENCE OF OVERTOPPING OF THE EMBANKMENT?	CONDITION OF OUTFALL FROM SEDIMENT BASIN

MAINTENANCE REQUIRED FOR SEDIMENT BASIN:

TO BE PERFORMED BY: _____ ON OR BEFORE: _____

OTHER CONTROLS

STABILIZED CONSTRUCTION ENTRANCE:

DOES MUCH SEDIMENT GET TRACKED ON TO ROAD?	IS THE GRAVEL CLEAN OR IS IT FILLED WITH SEDIMENT?	DOES ALL TRAFFIC USE THE STABILIZED ENTRANCE TO LEAVE THE SITE?	IS THE CULVERT BENEATH THE ENTRANCE WORKING?

MAINTENANCE REQUIRED FOR STABILIZED CONSTRUCTION ENTRANCE:

TO BE PERFORMED BY: _____ ON OR BEFORE: _____

ATTACHMENT #4

INSPECTION AND MAINTENANCE REPORT FORM (CHANGES)

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

REASONS FOR CHANGES:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

SIGNATURE: _____ DATE: _____